

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**ELANDER WOODALL, Individually and
on Behalf of All Others Similarly Situated,**

Plaintiff,

v.

**EVERGREEN PACKAGING, LLC AND
PACTIV EVERGREEN, INC.,**

Defendants.

Case No. 1:23-CV-459

Honorable Steven C. Seeger

**JOINT MOTION TO EXTEND DEADLINE TO FILE JOINT MOTION FOR
APPROVAL OF SETTLEMENT**

Plaintiff, Elander Woodall, individually and on behalf of all others similarly situated, and Defendants, Evergreen Packaging, LLC and Pactiv Evergreen, Inc., hereby jointly submit this Motion to Extend the Deadline to File the Parties' Joint Motion for Approval of Settlement:

1. On February 19, 2025, the Court granted the Parties' Joint Motion to Set Dates for Approval of the Settlement and ordered the Parties to file a Joint Motion for Approval on or before March 31, 2025. [Dkt. 91].

2. The settlement agreement has been fully executed by all Parties. However, due to the length of time spent negotiating the final terms of the settlement, the Parties require additional time to file the Joint Motion for Approval.

3. In addition, the current March 31, 2025, deadline coincides with pre-arranged travel plans for defense counsel.

4. The Parties respectfully request an additional 21-days, through April 21, 2025, to file the Joint Motion for Approval. The Parties are working through the Motion and expect this to be the last required extension to file the Joint Motion for Approval.

WHEREFORE, the Parties respectfully request additional time up to and including April 21, 2025, to file a Motion for Approval of the Settlement, for Plaintiff's counsel to file its Motion for Fees and Costs, and to set the Motion for Approval for hearing with this Court.

Dated: March 28, 2025

Respectfully submitted,

Elander Woodall

/s/ Josh Sanford

One of Her Attorneys

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Respectfully submitted,

Evergreen Packaging LLC and Pactiv Evergreen Inc.

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